UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:

Chesapeake Energy Corporation
414 Summers Street
Charleston, West Virginia 25301

ATTENTION:

Jody Jones
Manager Regulatory Affairs

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Chesapeake Energy Corporation, Chesapeake Exploration, LLC and any other subsidiary of either business entity with an ownership or operational interest in the Ohio facilities listed in Appendix C of this request (Chesapeake or you) to submit certain information about those facilities. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us according to the schedule in Appendix B.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Chesapeake owns and operates emission sources at the Ohio facilities listed in Appendix C of this request. We are requesting this information to determine whether your emission sources are complying with the Ohio State Implementation Plan and the New Source

Performance Standards for Crude Oil and Natural Gas Production, Transmission and Distribution.

Chesapeake must send all required information to:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

Chesapeake must submit all required information under an authorized signature with the following certification:

> I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix D, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix D provides additional information regarding the meaning and scope of the term "emissions data."

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. §§ 3501 - 3521, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Chesapeake to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Shilpa Patel at 312-886-0120 or patel.shilpa@epa.gov.

6/29/15
Date

George T. Czerniak
Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. We have provided the questions listed in Appendix B within a Microsoft Excel workbook format (Chesapeake114.xlsx) on a compact disc, flash drive or other similar item with this letter as an Enclosure. Please populate the workbook with your responses in the units noted. Each of the following instructions apply to each and every question contained in Appendix B.

2. Please adhere to the format contained in the workbook (worksheet: ResponseToQuestions). If your response requires a scanned or hardcopy document, you must identify the filename or document title. Make sure to correlate any hardcopy or scanned documents to a specific tank battery location name as listed in Appendix C.

3. For each question, identify each person whom you relied on or consulted with in preparing your responses to each question of this information request. Please use the enclosed workbook (worksheet: PersonsConsulted) to identify the person(s). Provide their name, title, job duties and duration of employment with Chesapeake. If they are not an employee of Chesapeake, provide their name, title, job duties and duration of employment with their employer.

4. For those questions where indicated, identify each document consulted, examined, or referred to in the preparation of your response or that contains information responsive to the question, and provide a true and correct copy of each such document if not provided in response to another specific question. Indicate on each document produced in response to this information request the number of the question to which it corresponds. Please use the enclosed workbook (worksheet: DocumentsConsulted) to identify such.

5. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.

6. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.

7. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that

any portion of the submitted information is or becomes false, incomplete, incorrect, or misrepresents the facts, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of a hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.

2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disc, flash drive or other similar item. Each compact disc or flash drive should be labeled appropriately (e.g., Company Name, Disc 1 of 4 for Information Request Response, Date of Response).

4. Documents claimed as confidential business information (CBI) must be submitted on separate discs/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the information claimed CBI. Please follow the instructions in Appendix D for designating information as CBI.

5. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 – 7671q, or the Standards of Performances for New Stationary Sources at 40 C.F.R. Part 60.

1. The terms "document" and "documents" shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or

in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.

2. The terms "relate to" or "pertain to" (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.

3. The term "liquid" or "liquids" shall mean (regardless of API gravity) oil, condensate, natural gas liquids, brine, and water that are produced as part of the well production stream and remain liquid at standard atmospheric and ambient temperature conditions.

4. The term "liquid storage tank" shall mean an atmospheric storage tank(s) that stores liquids as defined above and that is located at the tank battery locations listed in Appendix C.

5. The term "control device" or its plural shall mean the air pollution control equipment used to achieve VOC emission reductions, for example, flare, combustor, combustion device, vapor recovery unit, etc.

6. The term "person" or its plural or any synonym thereof, is intended to and shall embrace and include any individual, partnership, corporation, company, association, government agency (whether federal, state, local or any agency of the government of a foreign country) or any other entity.

7. The term "tank battery location name" shall mean the property, operations or facilities presently owned or operated by Chesapeake Energy, Inc. (Chesapeake).

8. The term "tank vapor capture system" or its plural shall include all vent lines, connections, fittings, valves, relief valves, thief hatches or any other appurtenance employed to contain and collect liquid storage tank vapors and transport or convey them to the emission control device.

9. The term "flash emissions" shall mean entrained natural gas vapors or other emissions that are released from hydrocarbon liquids when exposed to temperature increases or pressure drops, for example such as when liquids are transferred from production vessels to other vessels or to atmospheric storage tanks.

10. The term "working, breathing, standing (w/b/s) emissions" shall mean those emissions that can occur as vapors are displaced from the liquid storage tank headspace when the tank is filled (working) or when there are temperature or

pressure fluctuations in the liquid storage tank that volatilize lighter ends (breathing/standing).

11. The term "barrel" shall mean the liquid measure equivalent to 42 US gallons.

12. The terms "you" and/or "your" shall mean Chesapeake, and all its agents, servants, employees, representatives, investigators, accountants, auditors, attorneys, experts, consultants, contractors, and others who are in possession, custody, or control (actual or constructive), or that is otherwise available to you, of relevant information, or may have obtained information for or on behalf of Chesapeake.

Appendix B

Information You Are Required to Submit to EPA

Chesapeake must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a). For questions 1-5, Chesapeake must submit a response within 30 days of receipt of this request. For question 6, Chesapeake must submit a response within 60 days of receipt of this request.

1. Describe the relationship among Chesapeake Energy Corporation, Chesapeake Exploration, LLC, Chesapeake Energy Marketing, LLC, Chesapeake Operating, LLC, and any other subsidiary of these companies with an ownership or operating interest in the facilities listed in Appendix C, including common ownership interests, shared management, shared employees and personnel, joint assets and shared functions. Describe each entity's responsibilities related to the facilities listed in Appendix C.

2. For each tank vapor capture system and control device associated with each tank battery location listed in Appendix C, state whether Chesapeake conducted, prior to construction of the tank vapor capture system and control device, a design analysis of the tank vapor capture system and control device. If your response is yes, please provide the date of that analysis and state whether the design analysis was performed to ensure that the tank vapor capture system and control device were adequately designed and sized to handle reasonably foreseeable fluctuations in emissions in order to operate with no detectable emissions, and if not, why not. If a pre-construction design analysis was conducted, please supply all documents supporting the design analysis of each tank vapor capture system and control device. If Chesapeake did not conduct a pre-construction design analysis for any tank vapor capture system and control device associated with each tank battery location listed in Appendix C, please answer the question accordingly.

3. If Chesapeake did not conduct a design analysis of the tank vapor capture system and control device associated with each tank battery location listed in Appendix C prior to construction, as addressed in Question 2, state whether Chesapeake has ever conducted such an analysis. If your response is yes, please provide the date of that analysis and state whether the design analysis was performed to ensure that the tank vapor capture system and control device were adequately designed and sized to handle reasonably foreseeable fluctuations in emissions in order to operate with no detectable emissions, and if not, why not. If a design analysis was conducted, please supply all documents supporting the design analysis of each tank vapor capture system and control device, including the date of the analysis. If Chesapeake did not conduct a design analysis for any tank vapor capture system and control device associated with each tank battery location listed in Appendix C, please answer the question accordingly.

4. For those tank vapor capture systems and control devices associated with each tank battery location listed in Appendix C for which Chesapeake has never conducted a design analysis, please conduct a design analysis of the existing tank vapor capture system(s) and control device(s). Quantify the peak total emission flow (cubic feet per second) due to flash emissions attributed with liquid dump events from the pressurized vessel upstream of the liquid storage tanks, along with w/b/s emissions. Your design analysis must establish the flow capacity in cubic feet per second of the existing tank vapor capture system(s) and control device(s). You must supply input parameters, calculations and all supporting documentation in your response to this question.

5. Separately, for each tank vapor capture system associated with each tank battery location listed in Appendix C, provide responses to the information requested below. For ease of organization, we have provided a workbook as an Enclosure for these data to be entered with

column headings corresponding to the questions below. Please use this workbook (worksheet: ResponseToQuestions) to provide the following information:

a. Piping & instrumentation diagram of the process (wellhead(s) to control device). If more than one liquid storage tank is present within a tank vapor capture system, describe how liquids flow between liquid storage tanks.

b. Identify the gas gathering pipeline into which gas from the tank battery location enters and the maximum allowable operating pressure (psig) of that pipeline.

c. Provide a list of the wells which flow to the initial separator(s) and a narrative description of how the production from those wells is set to flow to the initial separator(s) (e.g., based on time, pressure, other parameter(s), or a combination of these). State whether more than one well can flow to an initial separator concurrent with another well or wells.

d. Provide a description, name and tag# ID of the initial separator(s) (e.g., single stage, dual stage, dual coil, HLP, VGR, etc.). For each stage of the initial separator(s) provide the following:

    i. The maximum operating pressure (psig) and temperature (°F).

    ii. If more than one stage in the initial separator(s), describe where flash emissions from subsequent stages of initial separator(s) are routed.

    iii. An indication of whether the final separator stage features a device on the liquid outlet line to prevent a vortex from forming during a liquid dump event which could lead to unintentional gas carry through.

e. Describe whether there is an intermediate separation vessel(s) between the initial separator and the liquid storage tank. If so, provide:

    i. The maximum operating pressure (psig) and temperature (°F).

ii. Describe where flash emissions from the intermediate separation vessel(s) are routed.

f. Provide the liquids outlet pipe interior diameter (inches) from the separation vessel immediately upstream of the liquid storage tank (if the interior pipe diameter is not available, measure the separator outlet exterior pipe diameter, and so note).

g. Provide the liquids outlet pipe orifice plate diameter (inches) from the separation vessel immediately upstream of the liquid storage tank.

h. Describe whether the produced liquids are trucked or piped offsite from the liquid storage tank. If trucked, provide the frequency of truck loadings and the approximate average liquid quantity of each load. If neither, provide an explanation.

i. Describe whether the flow of liquids from the separation vessel immediately upstream of the liquid storage tank is continuous or is in intermittent batches.

j. If the flow of liquids from the separation vessel immediately upstream of the liquid storage tank is in intermittent batches, provide:

    i. A narrative description of what triggers a liquid dumping event.

    ii. The maximum liquid volume (barrels) of the separation vessel immediately upstream of the liquid storage tank.

    iii. An estimate of the instantaneous flow rate during a dumping event. This may be estimated using one of the following methods:

        1. Instantaneous flow rate = average daily production (barrels) x (42 gallons/barrel) / (dumping frequency (dumping events per day) x duration of a dumping event (minutes). The average daily production should be calculated from Chesapeake's production data reported to the Ohio Department of Natural Resources Division of Oil and Gas

Resources for the time period January 1, 2011 through March 31, 2015, and should be entered in the EPA workbook (worksheet: ResponseToQuestions); or

2. Instantaneous flow can be calculated based on the flow coefficient of the dump valve (gpm/psi$^{0.5}$) and the pressure differential across the valve (psi) and the specific gravity of the hydrocarbon liquid (available in the extended hydrocarbon pressurized liquid analysis asked for in Question 6).

k. For each tank vapor capture system, provide the number of associated liquid storage tank(s) and the volume (barrels) capacity of each. For this question, associated liquid storage tank means a tank whose vapors are captured and conveyed to a tank vapor capture system.

l. Describe the liquid storage tank vapor capture system which routes tank vapors to each on-site control device by providing the following:

i. Pressure relief settings (psi) on the thief hatch and pressure relief valve on the liquid storage tank(s) or tank vapor capture system. Note any changes in pressure relief settings that may have occurred since construction and the date when changed.

ii. Thief hatch gasket/seal information, including the type of gasket/seal used (e.g. rubber, Viton).

iii. Pipe length (feet) from the liquid storage tank(s) to the control device (if the vapor capture system collects vapor from multiple tanks, use the average pipe length for all the liquid storage tanks to the control device).

iv. Inner pipe diameter (inches) of the tank vapor capture system from the liquid storage tank(s) to the control device.

v. Number of short radius elbows (short radius elbows have a radius equal to the pipe diameter).

vi. Number of long radius elbows (long radius elbows have a radius 1.5 times the pipe diameter).

vii. Number and type of valves (e.g., gate, check, globe, etc.).

viii. Describe any low points in the tank vapor collection system piping where liquids could accumulate. Describe the frequency of draining these liquids. Describe the indicator, if any, that notifies the operator that liquids must be drained.

ix. Set-point pressure (ounces per square inch) and maximum flow capacity (scf/hr) at that set-point of any backpressure valves installed on the vapor collection system.

x. A narrative description of the operations and maintenance program Chesapeake employs to ensure emissions are minimized from the liquid storage tank(s) and tank vapor capture system(s) including thief hatch(es) and pressure relief valve(s), and the frequency of such. Include any standard operating procedures for vapor recovery during truck loading, if applicable. If none exist, please so state.

xi. All records of any inspections conducted pursuant to 40 C.F.R §§ 60.5411 and 60.5416.

m. Identify the type of control device(s) used (e.g., combustion device, vapor recovery unit (VRU), etc.), the percent VOC reduction each control device is expected to

achieve, and the monthly hours of operation of each control device for the time period January 1, 2011 through March 31, 2015. If a combustor (i.e., enclosed flare) is used, provide the following:

i. The combustor manufacturer specifications showing the maximum flow rate of tank vapors under which a control efficiency of at least 95% for volatile organic compounds can be achieved (scf/hr).

ii. Combustor manufacturer and model.

iii. Combustor installation date.

iv. Combustor design and operation specifications (typically from the manufacturer) including flow rate limitations, turndown ratio, inlet pressure, btu/hr capacity,

v. The rated pressure loss across the combustor burner assembly as provided by the manufacturer of the combustion device (psi).

vi. Block diagram of the vapor combustor system identifying the collection piping system, manual and automatic valving, flashback protection devices, blowers, motors, instrumentation and controls.

vii. Description of any parametric monitoring system and/or remote monitoring system.

viii. Description of any parametric monitoring data collection and storage.

ix. Description of the temperature measurement device and its location.

x. The combustor manufacturer recommended maintenance and service requirements.

xi. The federal and/or state regulations that apply to the combustor.

xii. State whether the combustor and its associated closed vent system is used as the method of compliance with any federal and/or state regulation, including without limitation, the Ohio State Implementation Plan, the Standards of Performance for New Stationary Sources found at 40 C.F.R. Part 60, the National Emission Standards for Hazardous Air Pollutants found at 40 C.F.R. Part 61, and the National Emission Standards for Hazardous Air Pollutants for Source Categories found at 40 C.F.R. Part 63.

xiii. Provide copies of all testing reports or analytical results which relate to the combustor.

xiv. Provide a narrative description of the servicing Chesapeake performs on the combustor(s) and the frequency of such.

6. Provide the following analytical results for each tank battery location listed in Appendix C. Submit via pdf file, noting the filename in the workbook (worksheet: ResponseToQuestions):

a. The potential to emit working, breathing, and flash VOC emissions (in tons per year) from each of the facility's current liquid storage tanks and from each tank battery (i.e., if storage tanks are share a common vapor recovery system, provide each individual tank's potential to emit and the collective potential to emit of the tank battery sharing the common vapor recovery system) using API E&P TANKS, Version 2.0 or later. E&P TANKS calculations must reflect the actual liquids plumbing configuration of the tank battery (i.e., if the tanks are connected in series and the first tank in the series receives all or the majority of flash emissions, the calculations should reflect this). The software inputs shall be based on analyses of representative pressurized liquid

and gas samples from the pressurized vessel immediately upstream of the liquid storage tanks. Software inputs will be deemed non-representative if they are: obtained from the Geographical Database of sampled sites; liquid and gas samples collected from process vessels other than the pressurized vessel immediately prior to the liquid storage tanks; or are liquid and gas samples gathered more than 12 months prior to the date of this request. Provide copies of the input data, all documents and writings relied upon for the input data, and the generated model output data (i.e., include a complete printout of the report and not just the results page). Describe whether the potential to emit calculation reflects any state or federally enforceable emissions controls.

i. Provide a hydrocarbon liquid analysis sampling plan to ensure representative pressurized liquid and gas sampling and analyses were conducted. Follow the sampling protocol developed by the California Air Resources Board (CARB). The sampling protocol may be found at the following web address: http://www.arb.ca.gov/cc/oil-gas/flash_protocol_dec29.pdf. The protocol shall also include the specific type of sampler to be used and the expected operating pressure (or range of pressures) of the well in psig. If such samples and analyses have been taken and conducted within the past 12 months, you may provide that data in lieu of analyzing new samples. Include a copy of the lab analysis report showing:

    1. Date, start time, and end time of sample collection.
    2. Name of tank battery location.

3. Description of where, within the tank battery location process, the sample was collected.
4. Operating temperature (°F) and pressure (psi) of the vessel at the time the sample was collected.
5. The pressure (psi) of the sample at the time it was received by the laboratory.

At least 21 days prior to sampling, please provide the sampling protocol and schedule of sampling locations to Shilpa Patel and Natalie Topinka at EPA Region 5, at patel.shilpa@epa.gov and topinka.natalie@epa.gov.

b. API Gravity and Reid Vapor Pressure (RVP) (psia) of the "sales oil" in the liquid storage tank(s).

Appendix C

Tank Battery Location Name	Well Facility Name
BURRY 20-14-4	BURRY 20-14-4 6H BURRY 20-14-4 8H
CONIGLIO 7-14-4	CONIGLIO 7-14-4 1H CONIGLIO 7-14-4 3H CONIGLIO 7-14-4 6 CONIGLIO 7-14-4 6H
G SALTSMAN 28-14-4	G SALTSMAN 28-14-4 10H G SALTSMAN 28-14-4 6H G SALTSMAN 28-14-4 8H
HALEY 8-14-4	HALEY 8-14-4 10H HALEY 8-14-4 8H
HAWK 2-15-5	HAWK 2-15-5 1H HAWK 2-15-5 8H
JEFFERY 2-15-5	JEFFERY 2-15-5 10H JEFFERY 2-15-5 5H
LESLIE 9-14-4	LESLIE 9-14-4 8H
LOZIER 14-15-5	LOZIER 14-15-5 1H LOZIER 14-15-5 205H LOZIER 14-15-5 3H LOZIER 14-15-5 5H LOZIER 14-15-5 6H LOZIER 14-15-5 8H
MILLS 1-15-5	MILLS 1-15-5 1H MILLS 1-15-5 8H
PIDGEON A 22-15-5	PIDGEON A 22-15-5 5H PIDGEON A 22-15-5 6H
ALTENHOF 10-15-4	ALTENHOF 10-15-4 3H
D & B KIBLER 29-15-4	D & B KIBLER 29-15-4 1H
FRANK ZEHENTBAUER 26-15-4	FRANK ZEHENTBAUER 26-15-4 10H FRANK ZEHENTBAUER 26-15-4 3H
HANOVER FARMS 34-15-4	HANOVER FARMS 34-15-4 3H HANOVER FARMS 34-15-4 6H
HARTZ 18-12-2	HARTZ 18-12-2 1H
HUFFMAN TRUST 36-16-4	HUFFMAN TRUST 36-16-4 10H HUFFMAN TRUST 36-16-4 1H
JAN PAUL FARMS 17-15-4	JAN PAUL FARMS 17-15-4 8H
JUDY BROWN 27-15-4	JUDY BROWN 27-15-4 3H JUDY BROWN 27-15-4 6H
MELLINGER 7-12-2	MELLINGER 7-12-2 8H

Tank Battery Location Name	Well Facility Name
MRUGALA 6-14-3	MRUGALA 6-14-3 10H
PITTS 22-14-4	PITTS 22-14-4 10H PITTS 22-14-4 1H PITTS 22-14-4 3H PITTS 22-14-4 5H PITTS 22-14-4 6H PITTS 22-14-4 8H
ROY D 31-15-3	ROY D 31-15-3 8H
TREBILCOCK 25-15-4	TREBILCOCK 25-15-4 1H TREBILCOCK SOUTH 25-15-4 8H
WEAVER 23-15-3	WEAVER 23-15-3 3H

Appendix D

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b). "Emission data" provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2. "Emission data" means, with reference to any source of emissions of any substance into the air:

> Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;
>
> Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and
>
> A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as "trade secret" or "proprietary" or "company confidential" and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the Request to Provide Information as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to

continue to do so; that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential **by page, paragraph, and sentence.** Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, **explain with specificity** why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?
7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, **you bear the burden of substantiating your confidentiality claim.** Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING

I, Loretta Shaffer, certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by Certified Mail, Return Receipt Requested, to:

Jody Jones, Manager Regulatory Affairs
Chesapeake Energy Corporation
414 Summers Street
Charleston, West Virginia 25301

I also certify that I sent a copy of the Request to Provide Information Pursuant to the Clean Air Act by First-Class Mail to:

Robert Hodanbosi
DAPC Central Office
Ohio Environmental Protection Agency
P.O. Box 1049
Columbus, Ohio 43216-1049

Ed Fasko
APC Manager
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087

On the 30th day of June 2015.

Kathy Jones

Loretta Shaffer, Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7009 1680 0000 7644 3302

Standard bcc's: Official File Copy w/Attachment (s)

Originating Organization Reading File w/Attachment(s)

Other bcc's:

https://usepa-my.sharepoint.com/personal/patel_shilpa_epa_gov/Documents/Cheseapeake/Chesapeake 114.docx